

**UNITED STATES OF AMERICA** : **DATE FILED:** \_\_\_\_\_

**v.** : **CRIMINAL NO.** \_\_\_\_\_

**CLARKE BOWERS** : **VIOLATION:** 18 U.S.C. § 1347  
(health care fraud - 1 count)  
26 U.S.C. § 7206(1)  
(false tax returns - 1 count)

**COUNT ONE**

At all times material to this Information:

1. Defendant CLARKE BOWERS was the owner and operator of Clear Healthvision, Inc., which consisted of two pharmacies known as Marchwood Pharmacy and Banbury Pharmacy, located in Villanova, Pennsylvania.
2. Defendant CLARKE BOWERS also was a pharmacist licensed to dispense controlled substances by the Commonwealth of Pennsylvania, and worked at Marchwood and Banbury Pharmacies.
3. Defendant CLARKE BOWERS submitted claims to health care benefit plans, including those operated by Independence Blue Cross (IBC), Keystone Mercy Health (Keystone) and NPA, for reimbursement for prescriptions provided by Marchwood and Banbury Pharmacies.

4. From in or about 1996, through in or about June 2000, in the Eastern District of Pennsylvania, defendant

**CLARKE BOWERS**

knowingly and willfully executed a scheme to defraud a health care benefit program, that is, IBC, Keystone and NPA, and to obtain money and property owned by and under the custody and control of IBC, Keystone and NPA by means of false and fraudulent pretenses, representations, and promises, in connection with the delivery of, and payment for, health care benefits and services, by submitting and causing to be submitted on behalf of his customers fraudulent health care insurance claims for prescription drugs, in the approximate amount of \$151,052.53.

5. It was the object of the scheme that defendant CLARKE BOWERS obtained reimbursements from health care benefit plans to which he was not entitled by submitting false documentation to those plans for drugs that he did not provide to patients.

6. In furtherance of his scheme to defraud IBC, Keystone and NPA, defendant CLARKE BOWERS:

- submitted double claims to two separate carriers for the same prescription;
- submitted false claims for brand name drugs and then dispensed generic drugs to his customers;
- dispensed fewer drugs to his customers than the amount indicated on the prescriptions. He then submitted false claims for the larger amount of drugs listed on the prescriptions.
- submitted false claims that increased the dosage of the drugs he

dispensed, thus billing these insurance carriers for more drugs than the amount actually dispensed to his customers.

In violation of Title 18, United States Code, Section 1347.

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about April 15, 2000, in the Eastern District of Pennsylvania, defendant

**CLARKE BOWERS**

willfully made and subscribed a United States Individual Income Tax Return, Form 1040, for the calendar year 1999, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Director, Internal Revenue Service Center, Mid-Atlantic Region, at Philadelphia, Pennsylvania, which defendant CLARKE BOWERS did not believe to be true and correct as to every material matter, in that the return reported his total income as \$168,391, when in fact, as defendant well knew, his total income was approximately \$491,458, including the cash income he received from Clear Healthvision, Inc.

In violation of Title 26, United States Code, Section 7206(1).

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PATRICK L. MEEHAN  
United States Attorney